

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

LEK SECURITIES CORPORATION, SAMUEL LEK,
VALI MANAGEMENT PARTNERS d/b/a AVALON
FA LTD, NATHAN FAYYER, and SERGEY
PUSTELNIK a/k/a/ SERGE PUSTELNIK,

Defendants.

17-cv-01789 (DLC)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated July 16, 2019, Defendants Lek Securities Corporation and Samuel Lek hereby move the Court for an order: (1) granting leave to reopen expert discovery for the limited purpose of allowing the disclosure of Professor Chester Spatt and Mr. James Cangiano as defense expert witnesses, (2) setting a schedule for the submission of their reports, their depositions, and briefing on any related motions, and (3) granting such further relief as the Court deems just and proper.¹

Dated: July 16, 2019
New York, New York

Respectfully submitted,

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¹ Because this Motion to Reopen Expert Discovery does not fit squarely within the Court's 1(E) or 2(C) Rules, the Lek Defendants are erring on the side of caution in styling this as a formal motion. The Lek Defendants will of course make themselves available to conference this matter should the Court prefer a less formal structure.

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